

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§
IHEARTMEDIA, INC., <i>et al.</i> ¹	§ Chapter 11
Debtors.	§ Case No. 18-31274 (MI)
	§ (Jointly Administered)
	§

**STIPULATION AND ORDER REGARDING EXISTING DEADLINES
WITH RESPECT TO THE OBJECTION OF JAMES B. MARTIN TO
CONFIRMATION OF PLAN OF REORGANIZATION IN ABSENCE
OF AN ESTIMATION OF HIS CLAIM PURSUANT TO 11 U.S.C. § 502(C)(1)**

The above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), and James B. Martin (“Martin”, collectively with the Debtors, the “Parties”) hereby enter into this stipulation and agreed order (this “Stipulation and Order”) as follows:

WHEREAS, on December 10, 2018, Martin filed his *Objection of James B. Martin to Confirmation of Plan of Reorganization in the Absence of an Estimation of his Claim* (the “Objection”) [Docket No. 2148] in the United States Bankruptcy Court for the Southern District of Texas (the “Court”); and

WHEREAS, the hearing to confirm the *Modified Fifth Amended Joint Chapter 11 Plan of Reorganization of iHeartMedia, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* commenced on December 11, 2018, and has been continued to January 10, 2019, at 9:00 a.m. prevailing Central Time, pursuant to the *Order Regarding Confirmation Hearing Dates* [Docket No. 2171].

¹ Due to the large number of Debtors in these chapter 11 cases, for which joint administration has been granted, a complete list of the Debtors and the last four digits of their tax identification, registration, or like numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims, noticing, and solicitation agent at <https://cases.primeclerk.com/iheartmedia>. The location of Debtor iHeartMedia Inc.’s principal place of business and the Debtors’ service address is: 20880 Stone Oak Parkway, San Antonio, Texas 78258.

IT IS STIPULATED BY THE PARTIES AND HEREBY ORDERED THAT:

1. The Parties agree that Martin is not objecting to confirmation of the Plan, and the Parties reserve all rights with respect to the Objection, including with respect to the liquidation value of Martin's claim. Notwithstanding the foregoing, the Parties agree that the confirmation hearing may proceed prior to the resolution of the liquidation value of Martin's claim as set forth in the Objection. The Parties further agree that, in the event the Parties are unable to reach a consensual resolution of Martin's Claims either prior to or subsequent to the Confirmation of the Plan, the Parties' rights to a full and fair valuation of Martin's claims will be preserved.

2. The deadline by which the Debtors may file a response to the Objection (the "Response Deadline") shall be extended through and until January 31, 2019, at 11:59 p.m. prevailing Central Time.

3. The Response Deadline may be extended by written mutual agreement among the Debtors and Martin without further notice to the Court.

4. A hearing regarding the relief requested in the Objection shall be continued to a future date to be determined by agreement of the Parties and subject to the Court's approval.

Dated: _____, 2019
Houston, Texas

MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE

IN WITNESS WHEREOF, the Parties, by their authorized counsel, executed this

Stipulation and Order as of the date written below.

Houston, Texas
January 7, 2019

/s/ Patricia B. Tomasco

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